

**MARCH 1, 2007 IS THE EARLIEST ACHIEVABLE DATE FOR ALL TV  
RECEIVERS 13" OR LARGER TO INCLUDE A DTV TUNER**

- TTE supports the FCC's and Congress's policy goal of integrating digital reception capability into TV receivers as quickly as reasonably practicable to hasten the conversion to DTV and free up valuable spectrum for public safety and advanced wireless use. However, a date earlier than March 1, 2007 for integration of DTV tuning capability in 13"-24" TV receivers is not achievable without unacceptable risk of quality problems and needlessly high prices for consumers.
- The FCC recognized the importance of adopting achievable deadlines for DTV integration in its *Report and Order*, stating: "It makes little sense to require products to be on the market before the general population of manufacturers can deliver them....If manufacturers were not able to meet our deadline, they might cease production of [those-sized] sets or switch to monitor products that do not include TV tuners." There is no evidence that a deadline of December 31, 2006, or earlier, would be achievable for any manufacturer, much less for the general population of manufacturers.
- Adding DTV reception capability to an existing TV receiver model involves far more than soldering a single tuner/chip onto a circuit board. DTV integration requires a major re-engineering effort – and in the case of smaller-sized sets, an entirely new chassis – to accept the digital tuner, demodulator and other essential circuitry and related components. There are necessary cabinet modifications, all new reliability and safety testing, and, of course, regulatory approvals (as required for all radio-frequency emitters).
- The FCC and Congress both have recognized the importance of the 18-month manufacturing cycle in every instance where a new television technology has been mandated. Truncating this cycle for integration of DTV tuning capability in 13"-24" receivers would introduce unacceptable levels of complication and risk in terms of both product quality and availability as well as needlessly steep price increases for consumers. It also would be arbitrary and capricious as a matter of law.
- The FCC's stated rationale for accelerating this final deadline is to "...advance the date for all TV receivers to include a DTV tuner to a date not later than the statutory target date for the end of the transition ..." Congress almost certainly will enact legislation this fall to establish a hard statutory deadline for cessation of analog broadcasting sometime in 2009. A March 1, 2007 DTV tuner deadline for 13"-24" TV sets would afford 22-34 months lead time before the end of analog broadcast transmissions, more than sufficient time for consumers to obtain integrated DTV receivers to accommodate the switch to digital broadcasting, as recognized in the bipartisan "SAVE LIVES Act" (S. 1268), introduced by Senators McCain and Lieberman.
- The FCC supports its proposed accelerated December 31, 2006 deadline for DTV integration of 13"-24" TV receivers by asserting that the increased costs associated with DTV integration in those products will be "modest." This is erroneous. Integrating DTV tuning and reception capability will result in substantial increases in the costs of smaller-sized sets, as much as doubling the price of many 13" TVs and other products.